

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

PAUL MOORE,

Plaintiff,

v.

JEFFERIES & CO., INC.,

Defendant.

Civil Action No. 08 CV 3

Judge Blanche M. Manning
Magistrate Judge Maria Valdez

UNOPPOSED MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER

Defendant Jefferies & Company, Inc. (“Jefferies”) hereby brings this Unopposed Motion for Entry of Stipulated Protective Order to govern the treatment of certain confidential and proprietary information disclosed during the course of the above-captioned litigation. In support of this motion, which Plaintiff does not oppose, Jefferies states as follows:

- (1) The parties to this action have exchanged written discovery requests.
- (2) The parties anticipate the responses to these discovery requests and subsequent discovery in this proceeding will involve confidential information, including, but not limited to, nonpublic information subject to third-party confidentiality agreements.
- (3) Jefferies seeks protection of the sensitive, confidential nature of any such documents it may disclose in these proceedings.
- (4) To that end, counsel for the parties have reviewed the attached Stipulated Protective Order (Exhibit A), and agree that it would establish reasonable procedures for the protection of the parties’ confidential information.

(5) Jefferies has conferred with Plaintiff's counsel, who does not oppose this motion.

WHEREFORE, for all of the reasons set forth above, Jefferies respectfully moves for entry of the Stipulated Protective Order attached to this motion as Exhibit A.

Dated: August 29, 2008

Respectfully submitted,

/s/ James R. Daly

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Attorneys for Defendant Jefferies & Co., Inc.

CERTIFICATE OF SERVICE

I hereby certify that on August 29, 2008, I electronically filed the foregoing **Jefferies & Company, Inc.'s Unopposed Motion for Entry of a Stipulated Protective Order** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following at their e-mail address on file with the Court:

Bruce S. Sperling
Michael Dickler
Matthew Slater
SPERLING & SLATER, P.C.
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This 29th day of August, 2008.

/s/ Nicole C. Henning
Nicole C. Henning